

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL
GROUP, INC. 2008 SECURITIES
LITIGATION

MASTER FILE
08 Civ. 4772 (LTS)(KNF)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the pleadings, the accompanying memorandum of law, and all other papers and proceedings in this matter, the Underwriter Defendants,¹ Defendants American International Group, Inc., PricewaterhouseCoopers LLP, Edmund S.W. Tse, David L. Herzog, Andrew Forster, Steven Bensinger, Martin J. Sullivan and the Outside Director Defendants² will move this Court, before the Honorable Laura Taylor Swain, at a date and time to be determined by the Court, for an order pursuant to the Federal Rules of Civil Procedure, Rule 6.3 of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the inherent plenary powers of this Court, granting defendants' motion for reconsideration of this Court's September 27, 2010 Opinion and Order.

¹ The "Underwriter Defendants" are the financial institutions named in paragraph 51 of plaintiffs' Consolidated Class Action Complaint who served as underwriters and agents in certain AIG debt and equity offerings during plaintiffs' proposed Class Period, with the exception of Banca IMI S.p.A. and Daiwa Securities SMBC Europe Ltd., upon which plaintiffs have not effected service and against which plaintiffs' claims were dismissed by the Court's Opinion and Order dated September 27, 2010. *See* Slip. Op. at 3 n.2.

² The "Outside Director Defendants" are Stephen F. Bollenbach, Pei-yuan Chia, Marshall A. Cohen, Martin S. Feldstein, Ellen V. Futter, Stephen L. Hammerman, Richard C. Holbrooke, Fred H. Langhammer, George L. Miles, Morris W. Offit, James F. Orr III, Virginia M. Rometty, Michael H. Sutton, Robert B. Willumstad and Frank G. Zarb.

Dated: New York, New York
October 12, 2010

Respectfully submitted,

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